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October 3, 1999

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Counter TWA 325
Washington, D.C. 20554

**Re:Amendment of Part 15 of the Commission's Rules Regarding Spread Spectrum Devices
Notice of Proposed Rulemaking ET Docket No. 99-231**

Dear Ms. Salas,

I am writing to endorse the proposals set out in the above-referenced Notice of Proposed Rulemaking. Prime Performance Technologies, Inc. strongly supports the Commission's initiative to facilitate increased innovation and competition in the on-going development and use of broadband spread spectrum technologies at 2.4 GHz.

Our company and its customers benefit directly from advances in spread spectrum technology in the 2.4 GHz band. In particular as wireless systems integrators, we develop and deploy wireless local area and wide area networking systems. These systems allow our customers to deploy networks in historic buildings, bring Internet access to the classroom, support mobile communications, and provide for flexible work environments. Allocation of additional bandwidth will allow manufacturers to offer new products with backward compatibility thereby allowing our customer base to preserve its investment in wireless LANs.

Frequency hopping spread spectrum (FHSS) technologies are ideal for broadband applications. They are quite resistant to interference in this unlicensed communications band, which also is shared with such ISM devices as direct sequence spread spectrum devices, cordless telephones and microwave ovens. They consume very little power, which is a critical consideration for mobile devices. An enhanced bandwidth capability within the 2.4 GHz frequency range will provide higher throughput without sacrificing coverage.

Adoption of the Commission's proposal will mean that frequency hopping systems can more fairly access the available frequencies in the 2.4 GHz band. Moreover, frequency hopping systems that comply with the proposed rules will not result in additional interference to existing users of the 2.4 GHz band. For all these reasons, we urge quick adoption of the Commission's proposal in this proceeding.

Sincerely yours,

Prakash P. Thatte
President

